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11 GEOVECTOR CORPORATION

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION
17

18 **GEOVECTOR CORPORATION**, a California
19 corporation,

20 Plaintiff;

21 v.

22 **SAMSUNG INTERNATIONAL, INC.**, a New
23 Jersey corporation;
24 **SAMSUNG ELECTRONICS CO., LTD.**, a
25 Korean corporation;
26 **SAMSUNG ELECTRONICS AMERICA, INC.**,
27 a New York corporation;
28 **SAMSUNG TELECOMMUNICATIONS**
AMERICA, LLC, a Delaware limited
liability company; and
SAMSUNG RESEARCH AMERICA, INC., a
California corporation,

Defendants.

Case No. 3:16-cv-02463-WHO

**STIPULATION AND ORDER EXTENDING TIME
TO FILE OPPOSITION AND REPLY REGARDING
DEFENDANTS' MOTION TO DISMISS**

Date: October 19, 2016
Time: 2:00 PM
Presiding: Hon. William H. Orrick

Complaint Filed: May 5, 2015

JURY TRIAL DEMANDED

STIPULATION TO EXTEND TIME

This Stipulation is entered into by Plaintiff GeoVector Corporation (originally CritiCom Corporation, hereinafter “GeoVector,” or “Plaintiff,”) and Defendants Samsung Electronics Co., Ltd. (“SEC”), Samsung International, Inc. (“SII”), Samsung Research America, Inc. (“SRA”), and Samsung Electronics America, Inc. (“SEA”) (collectively, “Samsung,” or “Defendants”) by their respective counsel.¹

RECITALS

1. On May 5, 2016, Plaintiff filed its Original Complaint in the instant action.
2. On May 6, 2016, the Court scheduled the initial case management conference for August 3, 2016.
3. On May 13, 2016, Plaintiff served SEA with the Summons and Original Complaint.
4. On June 7, 2016, Plaintiff filed its First Amended Complaint.
5. Plaintiff agreed to an extension of time for the Defendants to respond to the Complaint by 90 days in exchange for SEC’s agreement to accept or otherwise waive service of the Summons and Complaint such that the Defendants’ response to the First Amended Complaint is due on the same date.
6. On June 13, 2016, the Honorable Donna M. Ryu signed a Stipulation and Order that contained the 90-day extension and continued the Case Management Conference from August 3, 2016 to September 21, 2016.
7. On September 2, 2016, Defendants filed a Motion to Dismiss First Amended Complaint in Part (the “Motion”).
8. For the past two weeks, lead counsel for Plaintiff, Mr. Jack Russo, has been ill and is overseas.

¹ The First Amended Complaint also lists Samsung Telecommunications America, LLC (“STA”) as a Defendant. Samsung has moved to dismiss STA as an improperly named Defendant, as STA merged into SEA prior to the filing of the Original Complaint. [Dkt. No. 14]. Samsung reserves the right to move to remove any other improperly-named parties at a later date.

STIPULATION

In light of Mr. Russo's illness, the parties agree that time schedule for the Opposition and Reply on the Motion be modified as follows:

A. The Deadline to File the Opposition to the Motion be changed from September 16, 2016 to September 23, 2016:

B. The Deadline to file the Reply in Support of the Motion be changed from September 23, 2016 to October 7, 2016.

Respectfully submitted,

COMPUTERLAW GROUP LLP

Dated: September 14, 2016

By: /s/ Christopher Sargent
Jack Russo
Christopher Sargent

Attorneys for Plaintiff
GEOVECTOR CORPORATION

PAUL HASTINGS LLP

Dated: September 14, 2016

By: /s/ Elizabeth L. Brann
Elizabeth L. Brann

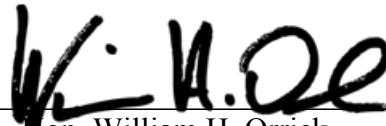
On Behalf of Defendants
SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG INTERNATIONAL, INC. and
SAMSUNG RESEARCH AMERICA, INC.

ORDER

Plaintiff's Opposition to Defendants' Motion to Dismiss First Amended Complaint in Part shall be filed no later than September 23, 2016.

Defendants' Reply in Support of Defendants' Motion to Dismiss First Amended Complaint in Part shall be filed no later than October 7, 2016.

Dated: September 16, 2016



Hon. William H. Orrick
United States District Judge